

R E M A R K S

Reconsideration of this application, as amended, is respectfully requested.

THE CLAIMS

Claims 1-3 have been amended to more clearly and positively recite the structural features of the present invention in better U.S. form, and claim 4 has been amended to recite a computer-readable storage medium in better U.S. form.

No new matter has been added, and it is respectfully requested that the amendments to the claims be approved and entered.

It is respectfully submitted, moreover, that amended claims 1-4 are in full compliance with the requirements of 35 USC 101, and it is respectfully requested that the rejection thereunder be withdrawn.

It is respectfully submitted, moreover, that the amendments to the claims are clarifying in nature only, and do not narrow the scope of the claims either literally or under the doctrine of equivalents.

THE PRIOR ART REJECTION

Claims 1, 2 and 4 were rejected under 35 USC 103 as being obvious in view of the combination of US 2003/0055905 ("Nishiyama

et al") and US 2003/0011687 ("Imura et al"), and claim 3 was rejected under 35 USC 103 as being obvious in view of the combination of Nishiyama et al, Imura et al and US 2003/0018777 ("Miller et al"). These rejections, however, are respectfully traversed.

As recognized by the Examiner, Nishiyama et al discloses audio data linked to image data, as shown, for example, in Fig. 3 thereof. In addition, as also recognized by the Examiner, Nishiyama et al discloses that the link between the audio and image data can be removed, either by deleting the audio and/or image data, or by removing the link without deleting the data, as explained in paragraph [0075] thereof. Indeed, according to Nishiyama et al, if only the link is deleted, the image data and sound data are left "as-is."

It is respectfully submitted, however, that Nishiyama et al does not disclose, teach or suggest first and second storage areas in the manner of the claimed present invention, wherein the first storage area stores audio data and image data linked thereto (to a predetermined playback position), and the second storage area stores only image data, and no audio data. In fact, according to Nishiyama et al, one folder is provided to store audio ("sound") data, while a second folder stores image ("picture") data. See Fig. 2 of Nishiyama et al.

Imura et al, moreover, has been cited for the disclosure of moving image data from one folder to another.

It is respectfully submitted, however, that since Nishiyama et al merely discloses a folder for image data and a folder for audio data, there would be no motivation to combine Imura et al with Nishiyama et al to achieve moving means for moving the image data, from which the link is canceled, from the first storage area (which stores linked image data and audio data and is not disclosed or suggested by Nishiyama et al) to the second storage area (which stores only image data) when the link is canceled by the link release means, as according to the present invention as recited in claim 1. And it is respectfully submitted that there would similarly be no motivation to combine Nishiyama et al and Imura et al to achieve the corresponding steps of claim 4.

Indeed, even if the Examiner's assertion that the "root" directory of Nishiyama et al corresponds to the first storage area of the present invention were reasonable, it is respectfully pointed out that according to the present invention the image data from which the link is canceled is moved from the first storage area to the second storage area. According to Nishiyama et al the "second" storage area (the picture data storage area) is clearly still within the root directory. Therefore even if image data is moved to the picture data storage area of Nishiyama et al the image data clearly is not moved from the

root directory to the picture data storage area, since the picture data storage area is in the root directory. Accordingly it is respectfully submitted that Nishiyama et al does not disclose a first storage area in the manner of the present invention, and that movement of image data from which the link is canceled in the manner of the claimed present invention would not logically be achieved by modifying Nishiyama et al as suggested by the Examiner.

Thus, it is respectfully submitted that the combination of Nishiyama et al and Imura et al does not disclose, teach or suggest a first storage area to store audio data and image data that is linked to a predetermined playback position of the audio data, and a second storage area to store only image data and no audio data. And it is respectfully submitted that since Nishiyama et al merely discloses a folder for image data and a folder for audio data, there would be no motivation to combine Imura et al and Nishiyama et al to achieve the feature of the present invention whereby image data is moved from a folder storing linked audio and image data, if the link is canceled.

Miller et al, moreover, has merely been cited for the disclosure of linking information via an image header, and it is respectfully submitted that Miller et al also does not disclose, teach or suggest the above described features of the present invention as recited in independent claims 1 and 4.

In view of the foregoing, it is respectfully submitted that the present invention as recited in independent claims 1 and 4 and claims 2 and 3 depending from claim 1, clearly patentably distinguishes over Nishiyama et al, Imura et al and Miller et al, taken singly or in combination under 35 USC 103.

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Entry of this Amendment, allowance of the claims and the passing of this application to issue are respectfully solicited.

If the Examiner has any comments, questions, objections or recommendations, the Examiner is invited to telephone the undersigned for prompt action.

Respectfully submitted,

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